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Hon. Andrew L. Carter, Jr.
United States District Court
40 Foley Square
New York, NY 10007

Re: James Morales v Kavulich & Associates, P.C., et. al.
Civil Action File No. 1:16-cv-02134-ALC
Motion For Extension of Time to Answer

May 20, 2016

Dear Judge Carter:

I represent Defendants. I just was retained yesterday; and today I file my Notice of Appearance.

Defendants' Answer was due on May 16, 2016. I have obtained the consent of Plaintiff's counsel for a 30 day extension of time to file an Answer on behalf of all Defendants. I write this letter seeking an Order from you allowing the above 30 day extension of time.

Defendants' failure to timely retain counsel or file an Answer was due to a medical issue with the person handling the case on behalf of the Defendants, Mr. Kavulich. Until recently, he was been in the hospital for a major surgical procedure. This resulted in the above delays.

Sincerely,

Mitchell L. Pashkin

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